

## REMARKS

Applicants respectfully request reconsideration of the present U.S. Patent application as amended herein. Claims 1-18 have been cancelled without prejudice. New claims 19-41 have been added. Therefore, claims 19-41 are pending.

Claims 1, 2, 5, 6, 10-12, and 14-16 are rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,493,447 issued to Goss et al. Claims 3, 4, 13, 17, and 18 are rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,493,447 issued to Goss et al in view of U.S. Patent No. 6,049,602 issued to Foladare et al. Claims 7-9 are rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,493,447 issued to Goss et al in view of U.S. Patent No. 6,192,050 issued to Stovall et al. To expedite allowance of the present application, claims 1-18 have been cancelled without prejudice.

New claim 19 recites the following:

receiving at a telephony server a web request for a call-back to a user, the web request including information associated with the user and the call-back;

converting the web request to a DTMF phone request via a DTMF string generator; and  
transmitting the DTMF phone request from the telephony server to a call center, the call center including an interactive voice response system to receive the DTMF phone request.

Claims 26 and 39 recite similar limitations.

Goss discloses a contact server for a call center. As stated in the Office Action, Goss does not disclose converting a web request to a DTMF phone request via a DTMF string generator. These limitations are recited in claims 19, 26, and 39. Therefore, Applicants submit that claims 19, 26, and 39 are patentable over Goss.

Folandare discloses a virtual call center. Foladare does not disclose converting a web request received at a telephony server to a DTMF phone request via a DTMF string generator.

Therefore, Foladare does not cure the deficiencies of Goss. Thus, Applicants submit that claims 19, 26, and 39 are patentable over Goss and Foladare.

The Office Action states that Stovall teaches a user device that is a personal computer, a PDA, or a laptop computer. Whether or not Stovall teaches these devices, Stovall does not teach converting a web request received at a telephony server to a DTMF phone request via a DTMF string generator. Therefore, Stovall does not cure the deficiencies of Goss and Foladare. Thus, Applicants submit that claims 19, 26, and 39 are patentable over Goss, Foladare, and Stovall.

Claims 20-25, 27-38, and 39-41 are dependent claims and distinguish for at least the same reasons as their independent base claim in addition to adding further limitations of their own. Therefore, Applicants submit that claims 20-25, 27-38, and 39-41 are patentable over Goss, Foladare, and Stovall for at least the reasons set forth above.

### Conclusion

In view of the amendments and remarks set forth above, Applicants submit that claims 19-41 are in condition for allowance and such action is respectfully solicited. The Examiner is respectfully requested to contact the undersigned by telephone if it is believed that such contact would further the examination of the present application.

Please charge any shortages and credit any overcharges to our Deposit Account number  
02-2666.

Respectfully submitted,  
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